

BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure	NUMBER IH91175
	REVISION FINAL Rev. 0
SUBJECT: Serving as the Confined Space Program Administrator	DATE 07/13/05
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1.0 Purpose & Scope

This document describes the function of the BNL SHSD Confined Spaces *Program Administrator (CSPA)*. The goal of the procedure is to provide a defined set of expectations to ensure high quality performance from the person in this role. Under the provisions of this procedure, the IH Group Leader receives the information to track program status to measure the progress towards the development and maintenance of outstanding IH programs.

This procedure provides direction on the:

- R2A2 (responsibilities) of the *Confined Spaces Program Administrator*, and
- Structure for the periodic reports used for program status tracking.

2.0 Responsibilities

- 2.1 The IH Group Leader identifies programs that need to have IH staff assigned to serve as *Program Administrators*. The IH Group Leader assigns a staff member to serve as the *Confined Space Program Administrator* (as personnel resources are available). The IH Group Leader receives weekly status reports and provides input to CSPA to redirect her/his activities, when appropriate, to meet the goal of developing and maintaining outstanding IH programs.

- ### 3.0 Definitions

- ## 4.0 Prerequisites

- ## 5.0 Precautions

6.0 Procedure

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Equipment: None

The key responsibilities and duties specific to the Confined Spaces Program are listed in *Attachment 9.2: R2A2 for the Confined Space Program Administrators* and are described below:

- 6.1 **Managing the SBMS IH Subject Area:** The *CS Program Administrator* serves as the SBMS *Confined Spaces* Point of Contact (POC) and Subject Matter Expert (SME). The CSPA leads revision teams as needed.
- 6.2 **On-going Regulatory Driver Review:** The *CS Program Administrator* researches current regulatory drivers from on-line databases and regulatory sites, maintains copies of the current applicable regulations and consensus documents, and retains historical (rescinded or revised) regulatory drivers and consensus documents.
- 6.3 **Annual Written Program Review:** The *CS Program Administrator* reviews the BNL written program for compliance with applicable regulatory driver(s) and determines if BNL written program (i.e. SBMS Subject Area, SOPS, etc.) contain all needed elements and comply with the regulatory driver. The CSPA follows applicable sections of IH50510 *Conducting an IH Self Assessment* when performing this assessment.
- 6.4 **Annual Service Delivery Review:** The *CS Program Administrator* reviews service providers to ensure compliance with applicable regulatory driver(s). Elements to be reviewed may include medical surveillance/approval, training, protective equipment specification and issuance, hazard assessments, exposure monitoring, etc. The CSPA follows the applicable sections of IH50510 *Conducting an IH Self Assessment* in conducting this assessment.
- 6.5 **Line Implementation Field Review:** The *CS Program Administrator* arranges for and conducts field reviews/inspections of line organizations operations as per the IH 50500 and the SHSD self Assessment Plan. The review is to include the annual OSHA required review of cancelled Permits.
- 6.6 **Inventory of hazards, users, sources, and/or locations:** Periodically, the CSPA prompts line organizations to maintain evergreen their inventories for the Confined Spaces Program. The CSPA is not the system owner of the confined space inventory

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however the CSPA will audit the inventory periodically. It is the Department's responsibility to update the inventory on the Emergency Services Division's Fire Run Cards (the official site of the inventory).

- 6.7 **Hazard Assessments and Exposure Monitoring:** The *CS Program Administrator* may assist in sampling efforts and exposure characterization for the program. The CSPA is responsible to determine the adequacy of the qualification criteria for monitor personnel of the various BNL service providers. Exposure monitoring records of personal exposure data collected during Confined Space entries are entered into the *Compliance Suite®* database by the organization collecting the data..
- 6.8 **Case Management:** The *CS Program Administrator* can serve as the IH Group's representative on accident investigation, incident report, and OMC cases involving Confined Space entries. When cases are opened, the CSPA participates in investigations and documents the status in the weekly reports to the IH Group Leader.
- 6.9 **Qualification of Practitioners:** The CSPA develops appropriate internal control documentation (SOPs) to ensure uniform implementation of service delivery by the IH Group. The *CS Program Administrator* develops and delivers training and qualification to IH Group service providers. The CSPA forwards records of IH staff meeting the qualification to the TQ Group for BTMS entry.
- 6.10 **Annual Status of the Program Report:** The *CS Program Administrator* prepares *Program Status report (or Self-Assessment Report)* per IH50510 and IH50520.
- 6.11 **Corrective Action Plan:** When the *Annual Status Report* or *Self-Assessment* has identified needed actions The *CS Program Administrator* prepares a *Corrective Action Plan* that addresses deficiencies or gaps that need correction as per IH50510 and IH50520.

7.0 Implementation and Training

- 7.1 **Qualification Criteria:** Only individuals who have demonstrated knowledge of this procedure and knowledge of the Confined Space Program to the satisfaction of the IH Group Leader, will be qualified to perform in the role of *CS Program Administrator*.

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- 7.2 **Certification as an SME:** When *certification* by a third party is available and deemed appropriate by the IH Group Leader, the CSPA should:
- Attain such certification if appropriately qualified or
 - Establish a career development goal to attain the required credentials to attain certification

9.0 Attachments

- 9.1 **Attachment 9.1: Sample of Weekly Activity Status Report**
- 9.2 **Attachment 9.2: R2A2 for Confined Space Program Administrator**

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10.0 Documentation

Document Development and Revision Control Tracking		
Prepared By: <i>(signature/date on file)</i> N. Bernholc 04/07/05 Certified Industrial Hygienist	Reviewed By / Date: <i>(signature/date on file)</i> R. Selvey 07/13/05 Certified Industrial Hygienist	Approved By / Date: <i>(signature/date on file)</i> R. Selvey 07/13/05 Industrial Hygienist Group Leader
ESH Coordinator/ Date: <i>none</i>	Work Coordinator/ Date: <i>none</i>	SHSD Manager / Date <i>none</i>
QA Representative / Date: <i>none</i>	Training Coordinator / Date: <i>none</i>	Filing Code: IH52.05
Facility Support Rep. / Date: <i>none</i>	Environ. Compliance Rep. / Date: <i>none</i>	Effective Date: 07/13/05
ISM Review - Hazard Categorization <input type="checkbox"/> High <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> Low/Skill of the craft	Validation: <input type="checkbox"/> Formal Walkthrough <input checked="" type="checkbox"/> Desk Top Review <input checked="" type="checkbox"/> SME Review Name / Date: N. Bernholc 7/13/05	IMPLEMENTATION: Training Completed: n/a Procedure posted on Web: 07/13/05 Hard Copy files updated: 07/13/05

Revision Log		
Purpose: <input type="checkbox"/> Temporary Change <input type="checkbox"/> Change in Scope <input type="checkbox"/> Periodic review <input type="checkbox"/> Clarify/enhance procedural controls		
Changed resulting from: <input type="checkbox"/> Environmental impacts <input type="checkbox"/> Federal, State and/or Local requirements <input type="checkbox"/> Corrective/preventive actions to non-conformances <input type="checkbox"/> none of the above		
Section/page and Description of change:		
<i>(signature/date on file)</i> SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:
Purpose: <input type="checkbox"/> Temporary Change <input type="checkbox"/> Change in Scope <input type="checkbox"/> Periodic review <input type="checkbox"/> Clarify/enhance procedural controls		
Changed resulting from: <input type="checkbox"/> Environmental impacts <input type="checkbox"/> Federal, State and/or Local requirements <input type="checkbox"/> Corrective/preventive actions to non-conformances <input type="checkbox"/> none of the above		
Section/page and Description of change:		
<i>(signature/date on file)</i> SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:

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Attachment 9.1

Sample: Weekly Program Administrator Activity Status Report

Program Title:_____

Report By:_____ **Week Ending:**_____

Action Item	Action this week by IHG	Due Date
Regulatory Driver search and review	<i>Describe action in detail done this week on this Action...</i>	<i>Insert Commitment date(s)...</i>
Program Review		
Service Provider Review		
Field- line organization Review		
Annual Program Status Report-Final Report	<div>Example</div>	
Corrective Action Plan- Final		
<i>Insert other Required or Optional Actions...</i>		
<i>Insert other Required or Optional Actions...</i>		
<i>Insert other Required or Optional Actions...</i>		
<i>Insert other Required or Optional Actions...</i>		
<i>Insert other Required or Optional Actions...</i>		
<i>Insert other Required or Optional Actions...</i>		
Closure of IHG Assigned Action Items from pervious Corrective Action Plans		

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Attachment 9.2

R2A2 for Role: *Confined Space Program Administrator*

- Inspect confined space use facilities/activities
- Verify Qualification of users
- Audit Training classes
- Conduct Annual Self Assessment of BNL Program
- Conduct Annual review of the Subject Area and lead improvement if needed
- Conduct Annual review of line organizations SOPs, ESR, Work permits, etc.
- Conduct qualification of hazard assessors, maintain records
- Periodically review Inventory confined space locations
- Critique off-normal occurrences
- Lead Corrective Action on program deficiencies
- Prepare ARAF as needed
- Prepare Weekly report to IH Group Leader
- Prepare annual Program Status Report or Self-assessment Report
- Consult on confined space respirator usage

- To Supervisor or any other authorized manager for quality and quantity of work, ideas on improvement opportunities, and for stewardship of assigned resources.
- To fellow staff for effective communication and safe and professional conduct.
- To Laboratory staff for providing expertise and guidance in assigned functional area.
- To DOE for implementation of any contractual requirements in area of expertise.
- To other regulating agencies which may govern aspects of functional area.
- To BNL community for disseminating exposure monitoring and hazard evaluation results.
- To assigned staff, for resource management and capability development, and for the quality and safety of their work environment.

- Exercise professional judgment and decision making in the execution of assignments.
- Make recommendations on Laboratory policies and procedures.
- Provide guidance to Laboratory managers and staff.
- Act, as necessary, to ensure safe and effective operations.
- Seek supervisory feedback on own performance.
- Identify training, information, equipment and facility needs to perform work.
- Cease work activity and/or Issue a Stop Work Order, if an imminent ES&H danger exists.
- Use available Laboratory programs to address concerns and employment issues.
- Improve management system operations.
- Take required action to complete technical assignments.
- Sign off on review of projects and plans.
- Act to ensure safe and effective operations.